

LAW OFFICE OF TODD D. LERAS
Todd D. Leras, CA SBN 145666
455 Capitol Mall, Suite 802
Sacramento, California 95814
(916) 504-3933
toddleras@gmail.com
Attorney for Defendant
JOSE MAYO RODRIGUEZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

JOSE ENCARNACION MAYO RODRIGUEZ,
SYLVIA ZAMBRANO, MARIA LUISA
ESCAMILLA LOPEZ, JUAN CHAVARRIA,
JUAN RAMON LOPEZ, NEREYDA
ALVAREZ, and CHARLES JAMES
BILLINGSLEY,
Defendants.

Case No.: 2:19-cr-00231-WBS

**STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE
AND EXCLUDING TIME UNDER THE
SPEEDY TRIAL ACT**

Date: June 6, 2022
Time: 9:00 a.m.
Court: Hon. William B. Shubb

This is a case charging conspiracy to distribute methamphetamine and heroin. It is presently set for status conference on June 6, 2022. The government has provided to defense counsel voluminous discovery consisting of approximately 4,400 pages of material, including numerous video and audio recordings, photographs, and written investigative reports.

ORDER CONTINUING STATUS
CONFERENCE

1 Many of the events at issue in the case occurred in San Joaquin County, with additional
2 matters occurring in Southern California and the San Francisco Bay Area. Defense investigation
3 into the charged events can be characterized as state-wide in scope. The global pandemic has
4 hampered or delayed some defense investigation efforts. This investigation is a prerequisite to
5 anticipated negotiated disposition as to several of the remaining defendants in this case.
6

7 The parties to this action, Plaintiff United States of America by and through Assistant
8 United States David Spencer, and Attorney Todd Leras on behalf of Defendant Jose Mayo
9 Rodriguez, Attorney Christopher Cosca on behalf of Defendant Sylvia Zambrano, Attorney Dina
10 Santos on behalf of Defendant Maria Escamilla Lopez, Attorney Clemente Jimenez on behalf of
11 Defendant Juan Chavarria, Attorney Philip Cozens on behalf of Defendant Juan Lopez, Attorney
12 David Garland on behalf of Defendant Nereyda Alvarez, and Attorney Johnny Griffin, III, on
13 behalf of Defendant Charles Billingsley, stipulate as follows:
14

- 15 1. By this stipulation, Defendants now move to vacate the status conference presently
16 set for June 6, 2022. The parties request to continue the status conference to August
17 29, 2022, at 9:00 a.m., and to exclude time between June 6, 2022 and August 29,
18 2022, inclusive, under Local Code T-4. The United States does not oppose this
19 request.
20
- 21 2. Based on the above-stated facts regarding the volume of discovery and the time
22 required for defense investigation, the parties jointly request that the Court find that
23 the ends of justice served by continuing the case as requested outweigh the best
24 interest of the public and the Defendants in a trial within the time prescribed by the
25 Speedy Trial Act.
26

27 ORDER CONTINUING STATUS
28 CONFERENCE

3. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of June 6, 2022 to August 29, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and (B) (iv) [Local Code T-4] because it results from a continuance granted by the Court at Defendants' request on the basis that the ends of justice served by taking such action outweigh the best interest of the public and the Defendants in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Assistant U.S. Attorney David Spencer and all defense counsel have reviewed this proposed order and authorized Todd Leras to sign it via email on their behalf.

DATED: May 31, 2022

By /s/ Todd D. Leras for
DAVID SPENCER
Assistant United States Attorney

DATED: May 31, 2022

By /s/ Todd D. Leras
TODD D. LERAS
Attorney for Defendant
JOSE MAYO RODRIGUEZ

DATED: May 31, 2022

By /s/ Todd D. Leras for
CHRISTOPHER R. COSCA
Attorney for Defendant
SYLVIA ZAMBRANO

ORDER CONTINUING STATUS CONFERENCE

1 DATED: May 31, 2022

2 By /s/ Todd D. Leras for
3 DINA L. SANTOS
4 Attorney for Defendant
5 MARIA ESCAMILLA LOPEZ

6 DATED: May 31, 2022

7 By /s/ Todd D. Leras for
8 CLEMENTE JIMENEZ
9 Attorney for Defendant
10 JUAN CHAVARRIA

11 DATED: April 28, 2020

12 By /s/ Todd D. Leras for
13 PHILIP COZENS
14 Attorney for Defendant
15 JUAN RAMON LOPEZ

16 DATED: May 31, 2022

17 By /s/ Todd D. Leras for
18 DAVID GARLAND
19 Attorney for Defendant
20 NEREYDA ALVAREZ

21 DATED: May 31, 2022

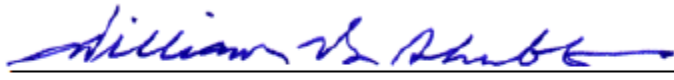
22 By /s/ Todd D. Leras for
23 JOHNNY GRIFFIN, III
24 Attorney for Defendant
25 CHARLES BILLINGSLEY

26
27
28 ORDER CONTINUING STATUS
CONFERENCE

ORDER

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for June 6, 2022, is vacated. A new status conference is scheduled for **August 29, 2022, at 9:00 a.m.** The Court further finds, based on the representations of the parties and Defendants' request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendants in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from June 6, 2022, up to and including August 29, 2022.

Dated: June 1, 2022


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

ORDER CONTINUING STATUS
CONFERENCE